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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
(DKT. 1423)**

I, Felipe Corredor, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo's Administrative Motion to File Under Seal Portions of Its Opposition to Defendants' Motion for Summary Judgment ("Waymo's Opposition") and exhibits thereto, filed concurrently herewith (the "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo's Opposition	Highlighted portions	Waymo (green highlighting), Defendants (blue highlighting), third party Velodyne (yellow highlighting)
Exhibit 1 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibit 3 to Jaffe Declaration	Entire document	Defendants; Waymo (green highlighting)
Exhibits 4-6 to Jaffe Declaration	Entire documents	Third party Velodyne
Exhibit 7 to Jaffe Declaration	Highlighted portions	Waymo (green highlighting)
Exhibit 8 to Jaffe Declaration	Entire document	Waymo
Exhibit 9 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibit 10 to Jaffe Declaration	Entire document	Waymo
Exhibit 11 to Jaffe Declaration	Entire document	Waymo
Exhibit 12 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibit 13 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibits 14-16 to Jaffe Declaration	Highlighted portions	Waymo (green highlighting)
Exhibit 18 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibit 21 to Jaffe	Highlighted portions	Waymo (green

Declaration		highlighting)
Exhibits 22-23 to Jaffe Declaration	Entire documents	Third party Velodyne
Exhibit 24 to Jaffe Declaration	Entire document	Third party Velodyne
Exhibit 25 to Jaffe Declaration	Highlighted portions	Waymo (green highlighting); Defendants (blue highlighting)
Exhibit 26 to Jaffe Declaration	Entire document	Third party Lior Ron; Defendants (red highlighting)
Exhibit 27 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibits 28-30 to Jaffe Declaration	Highlighted portions	Defendants (red and blue highlighting)
Exhibit 31 to Jaffe Declaration	Entire document	Defendants

3. Specifically, the green highlighted portions of Waymo's Opposition and Exhibits 3, 7, 21, and 25 to the Jaffe Declaration, as well as the entirety of Exhibits 1, 8-11, 13, 18, and 27 to the Jaffe Declaration, contain or refer to trade secret information, which Waymo seeks to seal.

4. The green highlighted portions of Waymo's Opposition, Exhibits 3, 7, 21, and 25 to the Jaffe Declaration, as well as the entirety of Exhibits 1, 8-13, 18, and 27 to the Jaffe Declaration, contain, reference, describe, and/or have a tendency to disclose Waymo's trade secrets. The information Waymo seeks to seal includes the confidential design and functionality of Waymo's proprietary autonomous vehicle system, including its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed.

5. Waymo's request to seal is narrowly tailored to those portions of Waymo's Opposition and Exhibits 1, 3, 7-13, 18, 21, 25, and 27 that merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on September 12, 2017.

Felipe Corredor
Attorneys for WAYMO LLC

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Felipe Corredor.

Charles K. Verhoeven